

**Affidavit of Communications with American
Express Bank supervisors, account managers
and Fraud Department.**

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEBORAH ROSS

Case No. CV-06096-FSH-PS

MICHAEL J. ROSS

Plaintiffs

-v-

**PLAINTIFFS' MOTION TO
DISMISS DEFENDANT(S)'
COUNTERCLAIMS**

PANTERIS & PANTERIS, LLP
GEORGE PANTERIS
PHILIP GIANELLI (correct spelling of name unknown)
BRANDON MARTIN
JANE & JOHN DOES (1-20; Employees
of PANTERIS & PANTERIS, LLP Attorneys,
secretaries and/or others)

Defendants

Deborah Ross
Michael J. Ross
P.O. Box 847
179 Ernest Garton Rd.
Alloway, NJ 08001
609-217-8143

PANTERIS & PANTERIS, LLP
GEORGE PANTERIS, ESQ
333 Sylvan Avenue, Suite 201
Englewood Cliffs, NJ 07632
Telephone No. (201)435-0536

Micheal J. Ross and Deborah Ross'

**AFFIDAVIT OF COMMUNICATIONS WITH AMERICAN
EXPRESS BANK, F.S.B. SUPERVISOR, ACCOUNT
MANAGERS AND FRAUD DEPARTMENT**

In the County of Salem

In the State of New Jersey

Affiants, Michael J. Ross and Deborah Ross (husband and wife), living human beings created by God, have prepared this affidavit on February 4, 2013 with the purpose of stating, in good faith and under oath, the facts that they have been able to gather and determine from information that has been available to them through inquiries, research, and/or from their first hand witness of the matters stated herein. Also this affidavit is prepared with the purpose of giving firsthand testimony of Michael J. Ross and Deborah Ross regarding what has gone on between them and George Panteris and other Defendants of this case. Also they give personal firsthand testimony regarding their communications with the corporate American Express Bank, F.S.B. regarding the activities of PANTERIS & PANTERIS, LLP in its actions against Deborah Ross and Jubilee Construction and regarding whether American Express Bank, F.S.B. has any claim against the Deborah Ross, Michael J. Ross or Jubilee Construction. Michael J. Ross and Deborah Ross make these statements in good faith and upon their best informed knowledge and belief, and they are, together and/or separately, able to testify to that which is stated herein if called upon to do so.

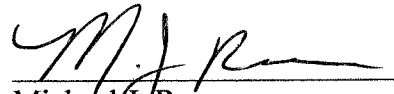
1. On October 5, 2012, the affiant(s), Deborah Ross and Michael J. Ross (signee for Jubilee Construction, L.L.C.) had a phone conversation with American Express Bank, F.S.B., prior to their court appearance in (Superior Court of New Jersey, Special Civil Part under Docket Number DC-001213-12)
2. On that morning Affiant(s) spoke to several American Express Bank, F.S.B. representatives: Supervisor, Account Manager and Fraud Department about this instant matter, whose identification numbers are: Anne ID no. 39281, Eric ID no. 85890 and Maria ID no. 40132.

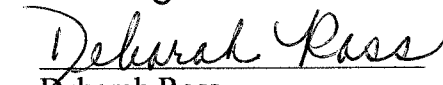
3. Affiants went through a series of phone transfers whereby they talked to a series of different American Express Bank F.S.B. representatives from varying departments, asking each of them the same questions and receiving the same answers and responses from each representative whether said person was Supervisor, Account Manager or Fraud Department – Affiants did *not* merely speak to just an entry level phone rep.
4. American Express Bank, F.S.B. Supervisor, Account Manager and Fraud Department were each separately asked to verify whether George Panteris, and PANTERIS & PANTERIS, LLP are attorney's for American Express Bank, F.S.B. and also verify whether they represented American Express Bank, F.S.B. in any complaint or suit against Deborah Ross and/or Jubilee Construction, LLC such as the specific case referenced above.
5. Through each of its representatives, it was stated by American Express Bank, F.S.B. that it did *not* retain George Panteris, and/ or PANTERIS & PANTERIS, LLP as its attorney and that George Panteris, and/ or PANTERIS & PANTERIS, LLP did not and do not represent American Express Bank, F.S.B. in any complaint or suit against the Affiants.
6. American Express Bank, F.S.B. Supervisor, Account Manager and Fraud Department also stated that American Express Bank, F.S.B. did not and does not have a claim, a complaint or a suit of any kind against Deborah Ross and/or Jubilee Construction, L.L.C.

7. It is a fact that Affiants concluded thereafter said foregoing communication with American Express Bank, F.S.B. that PANTERIS & PANTERIS, LLP and George Panteris are wholly acting on their own.

We affirm.

FURTHER AFFIANT SAYETH NOT.


Michael J. Ross


Deborah Ross

SWORN TO and subscribed before me this 18 day of Feb 2013.


Notary Public

My commission expires:

TAMARA L. CLARK
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 8/3/2017